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9 Attorneys for Specially Appearing for  
10 Third-Party Defendants, ASIA PACIFIC OIL &  
11 GAS LTD., a Seychelles Islands entity,  
12 AMIRZHAN JAKISHEV, and ADILZHAN DZHAKISHEV

13  
14 UNITED STATES DISTRICT COURT  
15 CENTRAL DISTRICT OF CALIFORNIA

16 KAZENERCOM TOO; ET AL., ) CASE NO. 08:09cv00059-JVS  
17 Plaintiffs, )  
18 v. ) Assigned for All Purposes to:  
19 TURAN PETROLEUM, INC.; ET AL., )  
20 Defendants. ) Hon. James V. Selna  
21 ) Dept: 10C  
22 TURAN PETROLEUM, INC., ) Date Action Filed: January 14, 2009  
23 Defendant and Counterclaimant, ) Trial Date: None Set  
24 v. )  
25 YERKIN BEKTAYEV and KANET )  
26 MEIRMANOV, ) **DECLARATION OF AMIRZHAN JAKISHEV**  
27 ) **IN SUPPORT OF THIRD-PARTY**  
28 ) **DEFENDANTS' MOTION TO DISMISS**  
Plaintiffs and Counterdefendant. ) **SECOND AMENDED THIRD-PARTY**  
TURAN PETROLEUM, INC., ) **COMPLAINT OF YERKIN BEKTAYEV AND**  
Defendant and Third-Party Plaintiff, ) **KANET MEIRMANOV**  
v. )  
WELLS FARGO, N.A., YERKIN AKKUZOV, ) [Filed concurrently with: [Proposed] Order;  
SABIRGAN DUHALIEV, IGOR MAXIMOV, ) Motion to Dismiss; Declarations of Adilzhan  
Defendants in Third-Party Complaint. ) Dzhakishev and John R. Flocken, Esq.]  
YERKIN BEKTAYEV and KANET ) Date: April 30, 2012  
1 ) Time: 1:30 p.m.  
Courtroom: 10C  

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**DECLARATION OF AMIRZHAN JAKISHEV IN SUPPORT OF THIRD-PARTY DEFENDANTS'**  
**MOTION TO DISMISS SECOND AMENDED THIRD-PARTY COMPLAINT OF YERKIN**  
**BEKTAYEV AND KANET MEIRMANOV**

1 MEIRMANOV, )  
2 Counterdefendants and Third-Party )  
3 Plaintiffs, )  
4 v. )  
5 ASIA PACIFIC OIL & GAS LTD. (incorporated) )  
6 in the Seychells Islands); AMIRGAN )  
7 DZHAKISHEV, ADILZHAN DZHAKISHEV,) )  
8 YURI VANETIK; ROBERT VAN DUREN;) )  
9 ROBIN BISARYA; OKKE FINANCIAL LTD.;) )  
10 ALCINA COMPANY CORP., PINGTON) )  
11 INVESTMENT LTD.; PINE BROOK S.A.,) )  
12 HINES INVESTMENTS S.A.; ESSEX) )  
13 MANAGERS LTD.; VARRIAL FINANCIAL) )  
14 TRADING LTD.; COAST FINANCE LTD.;) )  
15 FREEMAN FREEMAN SMILEY LLP, ) )  
16 Third-Party Defendants. ) )  
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I, Amirzhan Jakishev, declare:

1. I am a citizen and full-time resident of the nation of Kazakhstan. I have been  
2 named a third party defendant in the above action. I make this declaration based on my  
3 own knowledge and, if called as a witness, could and would testify competently to the  
4 matters stated herein.

2. I am informed that third-party plaintiffs Yerkin Bektayev and Kanet Meirmanov  
("Plaintiffs") attempted to serve the original Verified Third-Party Complaint in this matter on  
me by mail or delivery thereof to my former residence, located at 30 Rubinshtein Street,  
Almaty, Republic of Kazakhstan. I have not resided at that address for at least the past  
three years. The current residents at the time of the attempted service at the above  
address are not and never have been my managing or general agents or employees. Nor  
have they ever been authorized by me to accept service of process for any legal action

1 against me. At the time of such attempted service, I was not there. Nor were any of the  
2 other third party defendants present at the time of such attempted service.

3       3. I am further informed that Plaintiffs claim that they served the Verified  
4 Amended Third-Party Complaint in this matter on me by electronic mail and First Class  
5 Mail on or about June 30 and/or July 8, 2009, at the former California residence of my  
6 brother, Adilzhan Dzhakishev, located at 33 Skyridge, Newport Coast, California 92657.  
7 I never resided at this former residence of my brother. Nor do I have a place of business  
8 at my brother's former California residence. Nor was I present at the time of such alleged  
9 service.

10     4. The residents of 33 Skyridge are not and never have been my managing or  
11 general agents or employees. Nor have they ever been authorized by me to accept service  
12 of process or any legal action against me. I am unaware if Plaintiffs attempted to serve me  
13 by any other means than described above.

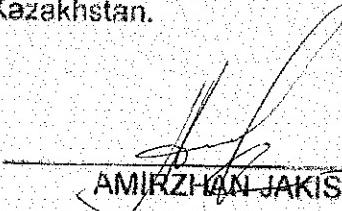
14     5. I have never imported or otherwise distributed any products to consumers in  
15 the State of California or anywhere else in the United States. I have never owned or  
16 leased any property in California or the United States. Nor have I conducted any  
17 advertising or marketing in California or the United States. Nor do I have any registered  
18 agents for service of process in the United States. Other than the present special  
19 appearance, I have never sought use of the courts within California or elsewhere in the  
20 United States. Nor have I been personally served with process or papers for any lawsuit  
21 in California or the United States. Nor have I operated a business, operated a web site,  
22 or issued press releases in the United States. I have never applied for a loan in California.  
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1       6. I have never lived in California or the United States. I have vacationed in  
2 California once in 2007 and again at the end of 2008 extending to the beginning of 2009.  
3 These visits were not related to Plaintiffs' claims in any way. I have lived in Kazakhstan  
4 all of my life. I have no intention of ever moving to the United States or seeking residence  
5 in the United States. I have never conducted or solicited any business in California or the  
6 United States.

7       7. I am neither the agent nor nominee for Asia Pacific for service of process.  
8 Contrary to Plaintiffs' allegations, I have not been involved in any unlawful transfer of  
9 Turan's or any other entity's stock, I have not been involved in the receipt of proceeds that  
10 originated from California, and I have not knowingly violated any California laws, including  
11 the California Uniform Fraudulent Transfer Act, or any other law, or damaged Plaintiffs in  
12 any way.

13       I declare under penalty of perjury under the laws of the State of California and the  
14 United States of America that the foregoing is true and correct. Executed on this 29 day  
15 of March, 2012, at Astana, Republic of Kazakhstan.

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AMIRZHAN JAKISHEV